

# United States District Court

for the  
Western District of New York

United States of America

v.

Case No. 25-MJ-1339

MATTHEW WHITE

*Defendant*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

Beginning on or about April 18, 2025 and continuing until on or about April 30, 2025, in the Western District of New York and elsewhere, the defendant, MATTHEW WHITE, did knowingly and willfully transmit in interstate and foreign commerce, specifically using the internet, communications that contained threats to injury Victim #1, in violation of Title 18, United States Code, Section 875(c).

This Criminal Complaint is based on these facts:

- Continued on the attached sheet.

DAVID T SWIECH JR   
Digitally signed by DAVID T  
SWIECH JR  
Date: 2025.06.26 10:31:56 -04'00'

*Complainant's signature*

DAVID SWIECH, JR.  
SPECIAL AGENT  
HOMELAND SECURITY INVESTIGATIONS

*Printed name and title*



*Judge's signature*

HONORABLE JEREMIAH J. MCCARTHY  
UNITED STATES MAGISTRATE JUDGE

*Printed name and title*

Sworn to and signed telephonically. Date:

June 30, 2025

City and State: Buffalo, New York

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

STATE OF NEW YORK )  
COUNTY OF ERIE ) SS:  
CITY OF BUFFALO )

I, **David Swiech Jr.**, Special Agent with United States Homeland Security Investigations (“HSI”) Department of Homeland Security, having been duly sworn, states as follows:

**INTRODUCTION**

1. I am a Special Agent with HSI and have so been employed since August 2020. I am currently assigned to the HSI Buffalo Border Enforcement Security Task Force (“BEST”), a HSI sponsored law enforcement task force comprised of local, state, federal, and Canadian law enforcement officers co-located in Buffalo, New York and tasked with combatting transnational criminal organizations (“TCOs”) exploiting vulnerabilities of the shared international border. As such, I am a law enforcement officer of the United States, within the meaning of Section 115(c)(1) of Title 18, United States Code, who is “authorized by law or by Government agency to engage in or supervise the prevention, detection, investigation, or prosecution of any violation of Federal criminal law.”

2. As a Special Agent, I am a graduate of the Federal Law Enforcement Training Center (“FLETC”), where I received both academic and practical application training in surveillance and counter surveillance techniques/methods. I received legal instruction in Federal immigration laws, preparing affidavits, Fourth Amendment Searches and Seizures, Federal Rules of Evidence, and the execution of search warrants. Prior to being a Special Agent, I was employed with the United States Border Patrol from 2016 until 2020 as a Border Patrol Agent. My duties as a Border Patrol Agent included of line watch operations and roving patrols in order to stop the entry of illegal persons and

substances attempting to enter the United States. Prior to employment with the U.S. Border Patrol, I graduated with a Bachelor's degree in Criminal Justice in 2014. My investigative and law enforcement experience, and the experience of other law enforcement agents who are participating in this investigation, serve as the basis for the opinions and conclusions set forth below.

3. The information contained in this affidavit is based upon your affiant's personal knowledge, upon reports and information received from other law enforcement officers and agencies, and other law enforcement activities. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

4. This affidavit is being submitted in support of a Criminal Complaint charging MATTHEW WHITE (hereinafter "WHITE") with a violation of Title 18, United States Code, Section 875(c). Because this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included every fact known to law enforcement concerning this investigation. I have set forth only facts that I believe are necessary to establish probable cause to demonstrate that **Matthew WHITE** has violated Title 18, United States Code, Section 875 (communicating interstate threats) (SUBJECT OFFENSE).

#### PROBABLE CAUSE

5. On or about April 30, 2025, HSI Buffalo learned of a series of threatening and violent public social media postings that were posted to an account believed to be controlled and operated by the defendant, MATTHEW WHITE ("WHITE"). Specifically, HSI Buffalo learned that the "X" account (formerly known as "Twitter") with display name "@matthewwhi17466" ("Subject Account") was engaged in publicly posting threats to federal immigration agents and administrators employed by the Department of Homeland Security.

6. The Subject Account “@matthewwhi17466” contains public information identifying the defendant, MATTHEW WHITE, as the owner and operator of the Subject Account. For instance, the top of the Subject Account display page contains a photograph of WHITE and lists his location as “Jamestown, New York” as depicted below:



7. During the investigation, HSI obtained records showing that Subject Account “@matthewwhi17466” posted public messages to “X” (formerly known as “Twitter”) using Internet Protocol (“IP”) addresses (1) connected to an account registered to WHITE’s home address in the name of his next door neighbor, and (2) connected to a Bar/Restaurant located next door to WHITE’s place of employment.

8. On or about June 4, 2025, HSI agents located WHITE at the “Sakura Buffet” restaurant in Lakewood, New York. WHITE agreed to speak with HSI agents about the subject of this investigation. WHITE was not in custody, and was not restrained in any way, and was informed he was free to leave. In substance, WHITE confirmed that the Subject Account “@matthewwhi17466” was his account. During the interview, WHITE unlocked his cellular device and showed agents that the Subject Account “@matthewwhi17466” was connected to and accessed

by the device in his possession. WHITE admitted to making the posts that are the subject of this investigation. WHITE admitted that he knew that writing the posts was wrong, but claimed he did not intend to commit any acts of violence.

9. During the voluntary interview in the parking lot of the “Sakura Buffet,” agents asked WHITE about the following post which was publicly posted to the Subject Account on or about April 30, 2025:



10. On June 4, 2025, WHITE initially denied making the post reproduced above about putting a bullet into “his [the agent’s] children.” When WHITE was shown a copy of the post reproduced above, WHITE admitted to making the post and stated “well OK if I wrote that then I didn’t ... mean it.” Shortly thereafter, a law enforcement officer told WHITE that these posts could incite violence, and WHITE responded “I know” and went on to state “I’m not going to do it, I have no intention of doing it, I’m not a violent person ... it seems like it but I’m not. To me it’s just like saying like ... if you’re going to go beat someone up it doesn’t mean you’re going to actually do it.” During the non-custodial interview of WHITE, WHITE allowed law enforcement to extract and copy the contents of his phone with the assistance of the local law enforcement forensic computer software. Following the extraction on the same day, the phone was returned to WHITE. During a search of the extraction, several photos on the device of WHITE appear to be “selfie” style photos taken of the

defendant which depict the same person depicted in the Subject Account's profile picture.

11. On or about April 18, 2025, Subject Account "@matthewwhi17466" publicly posted the following message, depicted in the screenshot below:



**Matthew White**  
@MatthewWhi17466

Kill them all, ICE is the new age gestapo, hurt them.

9:32 AM · Apr 18, 2025 · 6 Views

12. On April 29, 2025, Subject Account "@matthewwhi17466" posted the following message in response to a video clip of Border Czar Tom Homan posted by an "X" user "America":

 America ✅ @america · Apr 28

Border Czar Tom Homan: "You don't have to support ICE's operations... But when you cross that line to impede or knowingly harboring or conceding an illegal alien from ICE, you will be prosecuted. Judge or not."



From Rapid Response 47 🔍

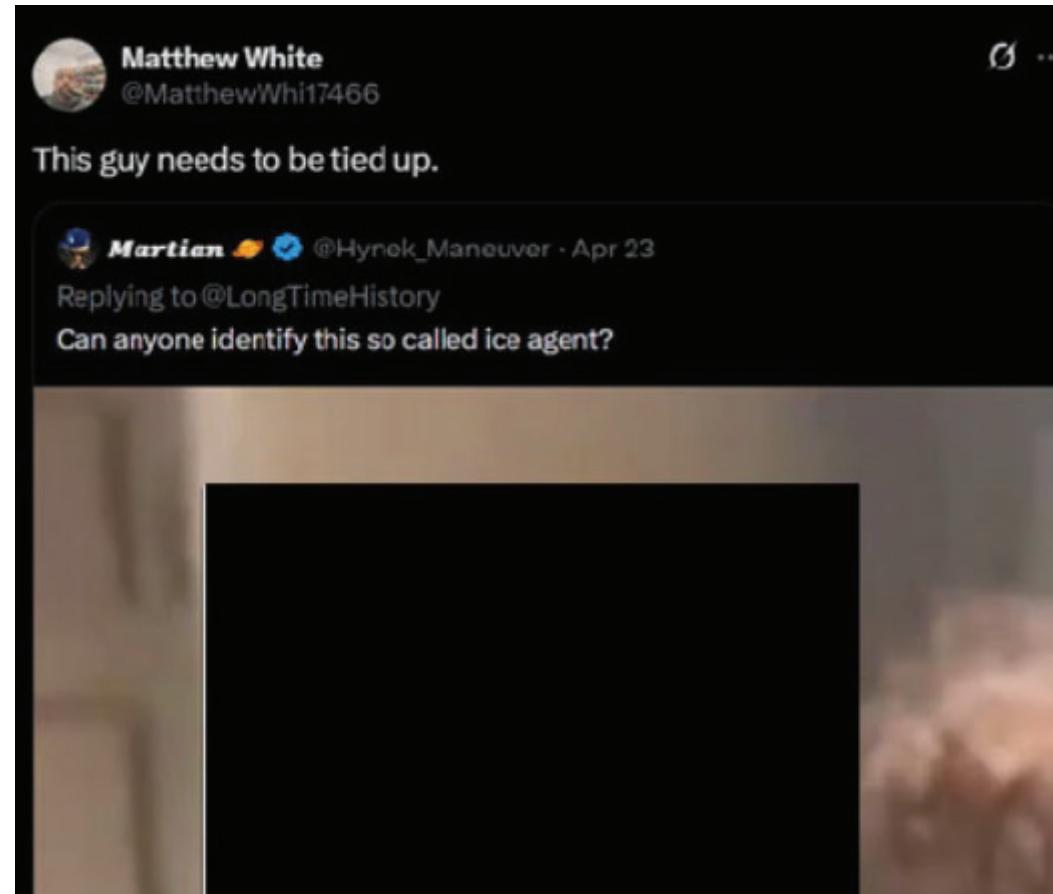
0:33

Matthew White  
@MatthewWhit7466

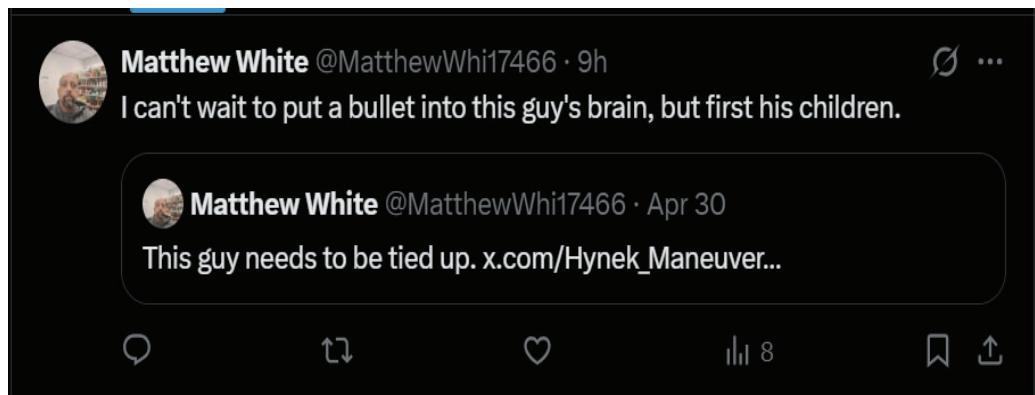
Then understand that if your ICE agents don't show proof of identity and a signed warrant, we will kill them

13. In late April, 2025, WHITE posted multiple threatening and violent public comments in response to coverage of several ICE arrest operations, including an ICE arrest operation inside a Virginia courthouse that occurred in or around April 2025.

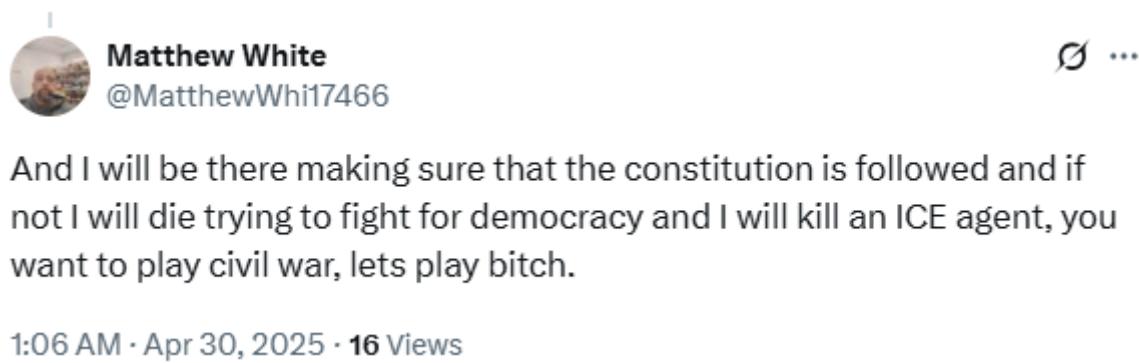
14. On April 23, 2025, an “X” account with username “Martian”/“@Hynek\_Maneuver” posted a still image of a person believed to be federal immigration agent taken from a publicly available video of an ICE arrest that occurred on April 22, 2025 at a Virginia Courthouse. On or about April 30, 2025, WHITE responded to @“@Hynek\_Maneuver” by commenting that “This guy needs to be tied up” as follows:



15. Shortly thereafter, WHITE posted another message in response to the still image of the federal immigration agent which stated, “I can’t wait to put a bullet into this guy’s brain, but first his children,” as follows:



16. On April 30, 2025, WHITE posted the following message, depicted in the screenshot below:



Matthew White  
@MatthewWhi17466

And I will be there making sure that the constitution is followed and if not I will die trying to fight for democracy and I will kill an ICE agent, you want to play civil war, lets play bitch.

1:06 AM · Apr 30, 2025 · 16 Views

17. On April 30, 2025, WHITE posted the following message, depicted in the screenshot below:



Matthew White  
@MatthewWhi17466

Your agents are in danger if they don't start showing identification and signed warrants, if the trump administration doesn't have to follow the laws then neither do the American citizens, game on.

2:08 AM · Apr 30, 2025 · 4 Views

18. Based on the foregoing, and on the investigation to date, I believe that WHITE wrote and posted the threatening and violent messages reproduced above using the "X" (formerly known as Twitter) account under the username "@matthewwhi17466." I believe that WHITE sent these posts using his internet connected smartphone, which is an internet connected cellular device, using the internet. I am aware that both the defendant's smartphone and the internet are instrumentalities and channels of interstate commerce. Therefore, as a result of WHITE sending and posting the messages described above, the messages were sent and transmitted through interstate commerce.

19. I have spoken with the federal agent the defendant referenced when stating “I can’t wait to put a bullet into this guy’s brain, but first his children” (“Victim #1”). Victim #1 has been directly impacted by the defendant’s posts. Victim #1 became aware of the posts referenced above shortly after they were publicly posted, and these online threats have affected and impacted daily activities and life.

### CONCLUSION

20. Based on the foregoing, I submit that probable cause exists to believe that beginning on or about April 18, 2025 and continuing until on or about April 30, 2025, the defendant, MATTHEW WHITE, violated Title 18, United States Code, Section 875(c), transmitting a communication containing a threat to injury another, in interstate commerce. I respectfully request that an arrest warrant be issued for the above-named defendant and that this criminal complaint and affidavit be filed under seal until such time as the defendant is arrested.

Respectfully Submitted,

DAVID T SWIECH  
JR

Digitally signed by DAVID T  
SWIECH JR  
Date: 2025.06.26 10:25:06 -04'00'

DAVID SWIECH, Jr.  
Special Agent  
Homeland Security Investigations

Affidavit submitted electronically by email in .pdf format. Oath administered and contents and signature attested to me and before me as true and accurate telephonically pursuant to Fed. R. Crim. P. 4.1 and 4(d) on June 30, 2025.




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HON. JEREMIAH J. MCCARTHY  
United States Magistrate Judge